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**UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

-----X		
Arnold Davis, on behalf of himself and all others	:	
similarly situated,	:	
	:	
Plaintiff,	:	Civil Case No.: 11-00035
	:	
v.	:	MOTION FOR SUMMARY
Guam, Guam Election Commission, et al.,	:	JUDGMENT PURSUANT
	:	TO FED. R. CIV. P. 56(a)
Defendants.	:	
-----X		

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

COMES NOW the Plaintiff, Arnold Davis, and files this Motion for Summary Judgment.
Mr. Davis hereby respectfully moves this Court for a judgment pursuant to Rule 56(a) of the

Federal Rules of Civil Procedure, declaring the qualifications for voter eligibility in the Political Status Plebiscite (“the Plebiscite”) required by 1 Guam Code Ann. § 2110, *et seq.*, to be in violation of the Fourteenth and Fifteenth Amendments to the United States Constitution, the Voting Rights Act, and the Organic Act, and enjoining the same.

Respectfully submitted,

/s/ J. Christian Adams

J. Christian Adams
Counsel for Plaintiff

Date: October 30, 2015

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the forgoing Plaintiff's Motion for Summary Judgment on counsel for the Defendants by filing the same through the Electronic Case Filing System on October 30, 2015, which provides an electronic copy of the same to all counsel of record.

/s/ J. Christian Adams

J. Christian Adams
Counsel for Plaintiff